

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
BOUCHARD TRANSPORTATION CO., INC., <i>et al.</i> , ¹)	Case No. 20-34682 (DRJ)
)	
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 165

**SUPPLEMENTAL DECLARATION OF MATTHEW RAY IN SUPPORT
OF THE DEBTORS' APPLICATION FOR ENTRY OF AN ORDER
(A) AUTHORIZING THE RETENTION AND EMPLOYMENT OF
PORTAGE POINT PARTNERS, LLC AS RESTRUCTURING ADVISOR
TO THE DEBTORS AND DEBTORS IN POSSESSION, EFFECTIVE AS OF
THE PETITION DATE, (B) DESIGNATING MATTHEW RAY AS CHIEF
RESTRUCTURING OFFICER, AND (C) GRANTING RELATED RELIEF**

I, Matthew Ray, being duly sworn, hereby state as follows:

1. I am a Founder and Managing Partner of Portage Point Partners, LLC ("Portage Point"), a consulting firm that has significant experience in providing financial advisory services both in- and out-of-court, and enjoys an excellent reputation for services it has rendered on behalf of debtors and creditors throughout the United States.

2. On October 27, 2020, the Debtors filed the *Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Portage Point Partners, LLC as Restructuring Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date, (B) Designating Matthew Ray as Chief Restructuring Officer, and (C) Granting Related Relief* (the

¹ Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.stretto.com/bouchard>. The location of the Debtors' service address is: 58 South Service Road, Suite 150, Melville, NY 11747.

“Application”)² [Docket No. 165]. In support of the Application, the Debtors filed the *Declaration of Matthew Ray in Support of Debtors’ Application for Entry of an Order (A) Authorizing the Retention and Employment of Portage Point Partners, LLC as Restructuring Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date, (B) Designating Matthew Ray as Chief Restructuring Officer, and (C) Granting Related Relief*, which was attached to the Application as Exhibit B [Docket No. 165, Ex. B] (the “Original Declaration”). On November 23, 2020, the Court entered the *Order (A) Authorizing the Retention and Employment of Portage Point Partners, LLC as Restructuring Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date, (B) Designating Matthew Ray as Chief Restructuring Officer, and (C) Granting Related Relief* (the “Retention Order”) [Docket No. 243].

3. In connection with the Application, the Retention Order, and the Original Declaration, I submit this supplemental declaration (the “Supplemental Declaration”) to provide additional disclosures as required under Bankruptcy Rules 2014 and 2016.³ Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein.

Portage Point’s Disinterestedness

4. In connection with its retention by the Debtors in these chapter 11 cases, Portage Point undertook a robust review to determine whether it had any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtors. Specifically, Portage Point obtained from the Debtors and/or their representatives the names of

² Capitalized terms used but not defined herein will have the meanings ascribed to such terms in the Application.

³ Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at Portage Point and are based on information provided by them.

individuals and entities that may be parties in interest in these chapter 11 cases (the “Potential Parties in Interest”).

5. Portage Point performed a robust search of present and former clients of Portage Point for connections to the Potential Parties in Interest in these chapter 11 cases, and certain connections were disclosed in the Original Declaration. Portage Point has been informed of certain additional Potential Parties in Interest to these chapter 11 cases. Such parties are listed on **Schedule 1** attached hereto.

6. Based on a review of the Potential Parties in Interest listed on **Schedule 1**, Portage Point represents that, to the best of its knowledge, Portage Point knows of no fact or situation that would represent a conflict of interest for Portage Point with regard to the Debtors. Given this, to the best of my knowledge, information, and belief, Portage Point neither holds nor represents any interest adverse to the Debtors’ estates and remains a disinterested party. Further, all disclosures made in the Original Declaration pertaining to Portage Point’s conflict check process and relationships with parties in interest are incorporated herein by reference and are fully applicable to the parties listed on **Schedule 1** hereto.

7. On March 30, 2021, I purchased a residential home located in the state of Michigan from Ryan Blaine Bennett, one of the lead attorneys from Kirkland & Ellis LLP, the firm retained as counsel to the Debtors (the “Michigan Transaction”). The Michigan Transaction was conducted at arm’s length and unrelated to the Debtors and these chapter 11 cases.

8. If Portage Point discovers additional information that requires disclosure, Portage Point will promptly file a supplemental disclosure with this Court as required by Bankruptcy Rule 2014. Portage Point reserves the right to supplement this Declaration in the event that Portage

Point discovers any facts bearing on matters described in this Supplemental Declaration regarding Portage Point's employment by the Debtors.

Dated: April 12, 2021
Houston, Texas

/s/ Matthew Ray

Matthew Ray
Founder and Managing Partner
Portage Point Partners, LLC

Schedule 1

List of Potential Parties in Interest

Lenders & Lienholders

JMB Capital Partners

Other Parties

Gulf Marine Repair
Babson, Bryce
Bailey, Christopher
Drawbridge Special Opportunities Fund LP
Dunham, Robert
Hall, Roger
Houston NFL Holdings LP
Paulsboro Refining Co. LLC
Peaslee, Justin
Roberts, Lonnie
T&T Offshore Inc.
Yellow Fin Marine Consulting LLC
ABS Nautical Systems LLC
ADP Inc.
Aetna Inc.
Airweld Inc.
American Express Co.
Answering Service Care
Avondale Marine LLC
Badke, John
Benic, Boric
Bizzuka
Boeing Digital Solutions
Chevron Leesville
De Girolamo, Mary
Delaware River Harbor Pilots
Didier, Gerard
DNV GL AS
DNV GL USA Inc.
ExcelAire LLC
ExxonMobil
E-Z Pass
Faller, Paul
Federal Insurance Co.
FedEx Corp.
FM:Systems Inc.
Gawrych, Michael
GKG Law PC
Gulf Marine Warehouse
Hall, Roger
Harbor Pilots of NY NJ LLC
Hauser, Jeffrey
Hobe Sound Golf Club
Hutchison, John A.
ISR Swim Angels
Jerry's Car Care Center Inc.
K&L Gates LLP
Lafayette, Parish of (LA), Tax Collector
Loetterle, Richard
Marine Towing of Tampa LLC

Martin Midstream GP
Martin Midstream GP LLC
Medalist Corp.
MG Auto Center Inc.
National Vision Administrators LLC
Nautical Chart Supply Inc.
Nextlevel Information Solutions
NJ E-Z Pass
Northwest Registered Agent Inc.
Optimum 7801Cable Pm
Piccolo Restaurant LLC
Pilots' Association for the Bay & River Delaware,
The
Podell Schwartz Schechter & Banfield LLP
Poesl Marine Corp.
Port Ship Service Inc.
Prudential Group Insurance
Quadient Leasing USA Inc.
ReadyRefresh
Royal Oaks Country Club
Schlam Stone & Dolan LLP
Sir Speedy Inc.
Sivori, William
Smc Aviation Inc.
South Brooklyn Marine
South Brooklyn Marine Terminal
St. Petersburg, City of (FL)
Staten Island Homeport
Tolls by Mail
Total Quality Logistics LLC
Total Technology Solutions Ltd.
Tsakos, Theofanis
Valero Marketing & Supply Co.
Violations Processing Center
Wheatley Hills Golf Club Inc.
Xerox Corp.
Zuclich, Robert

Professionals

Stroock, Stroock & Lavan
Lowenstein Sandler
Lugenbuhl, Wheaton, Peck, Rankin & Hubbard
Morrison Cohen, LLP
Seward & Kissell
Reed Smith LLP
McGlinchey Stafford LLP
King & Jurgens
Milbank
Chalos & Co, P.C.
ECM Maritime Services, LLC
Adams & Reese LLP
Bland & Partners PLLC
Broward, County of (FL), Attorney's Office
Cain & Skarnulis PLLC
Cozen O'Connor

Frilot LLC
Fulbright Tower
Hofmann & Schweitzer
Jones Walker LLP
Julian & Seele PC
Kennedy Lillis Schmidt & English
Kilmer Crosby & Quadros PLLC
Linebarger Goggan Blair & Sampson LLP
Liskow & Lewis
McLauchlan Law Group LLC, The
Meyner & Landis LLP
Nicoletti Hornig & Sweeney
Schouest Bamdas Soshea & Benmaier PLLC
Simms Showers LLP
Staines Eppling & Kenney LLC
Tabak Mellusi & Shisha LLP
Vaughn & Ramsey PLLC
Westerman Ball Ederer Miller Zucker &
Sharfstein LLP
Winstead PC

Landlords

Northeastern Air Management Corp.

Utilities

Cablevision Lightpath, Inc
Optimum
Satcom Direct, Inc
Unique Sanitation Co., Inc
Verizon
Aviation Spectrum Resources, Inc